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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |                                  |
|--|----------------------------------|
| -----X                                     |                                  |
| <b>In re</b>                               | : <b>Chapter 11</b>              |
| <b>SEARS HOLDINGS CORPORATION, et al.,</b> | : <b>Case No. 18-23538 (RDD)</b> |
| <b>Debtors.<sup>1</sup></b>                | : <b>(Jointly Administered)</b>  |
| -----X                                     |                                  |

**NOTICE OF WITHDRAWAL REGARDING DEBTORS'  
THIRTY-SEVENTH OMNIBUS OBJECTION TO PROOFS OF  
CLAIM (RECLASSIFYING CLAIMS) SOLELY AS TO CERTAIN CLAIMS**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is c/o M-III Partners, L.P., 1700 Broadway, 19<sup>th</sup> Floor, New York, NY 10019.

**PLEASE TAKE NOTICE** that on October 19, 2021, Sears Holdings Corporation and certain of its affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) filed the *Debtors’ Thirty-Seventh Omnibus Objection to Proofs of Claim (Reclassifying Claims)* (ECF No. 9976) (the “**Thirty-Seventh Omnibus Objection**”).

**PLEASE TAKE FURTHER NOTICE** that Debtors hereby withdraw the Thirty-Seventh Omnibus Objection, without prejudice, solely with respect to the claims listed on **Exhibit 1** attached hereto.

Dated: November 5, 2021  
New York, New York

/s/ Garrett A. Fail  
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**Exhibit 1**

**In re: Sears Holdings Corporation, et al.  
Case No. 18-23538 (RDD)**

| Ref<br># | Name of Claimant       | Affected<br>Claim No. |
|----------|------------------------|-----------------------|
| 81.      | Carol, Naud            | 11294                 |
| 152.     | Epic Designers Limited | 5961                  |
| 191.     | Gokaldas Exports Ltd.  | 20155                 |
| 411.     | Roth, Jeffrey E.       | 10971                 |